

WILLKIE FARR & GALLAGHER LLP

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March 7, 2008

VIA ECFS

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Notice of Ex Parte Presentation; Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114; Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102; 911 Requirements for IP-Enabled Service Providers, WC Docket No. 05-196***

Dear Ms. Dortch:

On March 6, 2008, Michael Amarosa of TruePosition, Inc. accompanied by Philip L. Verveer and the undersigned of Willkie Farr & Gallagher LLP met with Angela Giancarlo, Senior Legal Advisor to Commissioner McDowell, Renee Crittendon, Legal Advisor to Commissioner Adelstein, Aaron Goldberger, Legal Advisor to Chairman Martin, Wayne Leighton, Legal Advisor to Commissioner Tate, and Bruce Gottlieb, Legal Advisor to Commissioner Copps.

The parties discussed the state of the record in this proceeding. Consistent with past filings, Mr. Amarosa explained that TruePosition is confident that the Commission's 5 year deadline is achievable, but remains unconvinced that the interim 1-year and 3-year benchmarks are achievable.¹ To that end, he urged that the Commission elaborate upon what already was said in the Order -- that it does "not intend to penalize carriers that are making good faith efforts to comply with our location accuracy requirements"² -- by explicitly invoking the potential for carriers to apply for waivers. He also explained that the Commission might be better served by rescinding the interim benchmarks and adopting a more qualitative, "best practices" approach to ensuring that carriers are working towards meeting the 5 year goal. Such an approach would be more consistent with the reality that location accuracy improvement must have a cost-benefit component.

¹ See Letter of Daniel K. Alvarez, Counsel for TruePosition, Inc., to Ms. Marlene Dortch, Secretary, FCC, PS Docket No. 07-114 (filed Nov. 8, 2007).

² In re Wireless E911 Location Accuracy Requirements et al, Report and Order, 22 FCC Rcd 20105 ¶ 16 (2007).

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Please direct any questions to the undersigned.

Respectfully submitted,

/s/ *Daniel K. Alvarez*
Daniel K. Alvarez
WILLKIE FARR & GALLAGHER LLP
Counsel for TruePosition, Inc.

cc: Ms. Renee Crittendon
Ms. Angela Giancarlo
Mr. Aaron Goldberger
Mr. Bruce Gottlieb
Mr. Wayne Leighton